CORRES. CONTROL
OUTGOING LTR NO.

90RF3248

EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

DIST.		
ALLHOFF, F.H.		
BREEN, J. H.		
BRETZKE J.C.		
BURLINGAME, A.H.		
CROUCHER, D.W.		
DAVIS, J.G.		
DERRERA, D.W.		
DERRIS, L.R.		
FRANCIS, G.E.		
GOODWIN, R.		
HEALY, T.J.		
KERSH, J.M.	X	
LIBBY, W.A.		
MAJESTIC, J.R.		
McKINLEY, K.B.	X	
MELLEN, J.B.		
MORGAN, R.V.	X	
PARNELL, R.F.		
POTTER, G.L.	X	
RHOADES, J.L.	X	
RISNER, V.L.		
SANFORD, T.H.		
SHANNON, W.M.		
VAN LEUVEN, D.B.		
WARNER, B.P.		
YOUNG, E.R.		
[illegible]	X	
BETCHER, D.H.		
CARNIVAL, G.J.		
HARMAN, L.K.		
HEBERT, J.L.		
HOFFMAN, R.B.		
KLAMMAN, R.L.		
KREIG, D.M.		
LOUDENBERG, G.E.		
NAIMON, E.R.		
NEWBY, R.L.		
TURNER, H.L.		
VELASQUEZ, R.N.	X	
GREENHAUGH	X	
GLAHA	X	
ARNDT	X	
CORRES CONTROL	X	X
CONTRACT ADMIN.		

CLASSIFICATION: UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER SIGNATURE

DATE 6/18/90

IN REPLY TO LTR NO.

PC#

LTR APPROVALS:

ORIG & TYPIST INITIALS

FB:SF

RF-46469 (Rev 4/90)

JUL 5 1990

90-RF-3248

Robert M. Nelson, Jr.
Manager
DOE, RFO

Attn: R. J. Schassburger

CDH COMMENTS OF MAY 1, 1990, REGARDING INSIDE BUILDING CLOSURES

Attached are draft responses to CDH comments raised in their May 1, 1990, letter. These comments pertain to Inside Building Closure Plans and should be mailed to CDH on July 1, 1990.

Please contact Tom Greengard on extension 7121 if you have any questions or comments.

J. M. Kersh, Associate General Manager
Environmental Restoration & Waste Management

FB:sf

Attachment:
As Stated

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
BY G. T. Ostdiek
DATE 6-9-93

DRAFT

Mr. Gary W. Baughman
Unit Leader, Hazardous Waste Facilities
Hazardous Materials and Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, CO 80220-8333

INSIDE CLOSURE PLANS, OU3, SITES 211, 212, 204, 210

This letter is in response to your letter of May 1, 1990 concerning Inside Building Closures. The Division's comments and our responses are as follows.

Sites 204, 210, 211, and 212
Comment: Submittal of ARAR analysis as an addendum to closure plans internal to buildings is necessary to satisfy requirements of I.B.10 of the IAG Statement of Work.

Response: An ARAR analysis for inside building closure plans is inappropriate because the closure plans call for complete decontamination of the areas. Contamination present under buildings will be addressed as a RCRA Facility Investigation/Corrective Action activity related to decontamination and decommissioning of the Rocky Flats Plant buildings.

Site 210
Comment: Site 210, Unit 16 has been mistakenly listed with the inside building closures and will be relisted in the final IAG as an outside building closure.

Response: The Rocky Flats Plant is in agreement with the Colorado Department of Health on this comment.

Site 211
Comment 1: The use of 0.15M hydrazine, a listed hazardous waste, in the decontamination solution for Site 211, Unit 26, has been discussed with Howard Rose in a telephone conversation April 16, 1990. The substitution of tartaric acid, calcium chloride, schubert's solution or other suitable non-hazardous chelating agents in place of hydrazine was also discussed. The reformulation of the decontamination solution for Site 211 should be addressed.

DRAFT

Response 1: The Rocky Flats Plant agrees that hydrazine should be replaced with some other suitable non-hazardous chelating agent. The function of the hydrazine in the decontamination fluid was to act as a strong reducing agent. A strong reducing agent may be needed for scale removal in elbows and other such areas subject to scale growth. The Rocky Flats Plant proposes the use of 0.25 Molar citric acid, a mild reducing agent, and 0.5% ethylenediaminetetraacetic acid (EDTA) as the chelating agent to be used in place of the hydrazine solution. EDTA is a strong chelating agent and has seen routine use in radioactive decontamination fluids. The use of EDTA will be incorporated into the revised closure plans.

Comment 2: Explain how complete decontamination of the wooden pallets from Site 211, Unit 26 would be demonstrated.

Response 2: The Rocky Flats Plant proposes that those pallets that can be identified as having seen use of Site 211, Unit 26, be disposed of as a mixed low-level radioactive and hazardous waste.

Site 212

Comment 1: The chemical constituents of the decontamination solution SOLNI used on Site 212, Unit 63 must be identified, if the efficacy of the solution is to be determined.

Response 1: The chemical constituents of the decontamination solution SOLNI cannot be determined. It was reportedly a proprietary solution used at the Oak Ridge, Tennessee, DOE facilities. However, references to its use can no longer be identified, nor can any personnel involved with use of this material. It is suggested that the SOLNI solution be replaced with a solution of chelating agents. A solution of citric acid, EDTA and deionized water should be adequate for decontamination of low-level radioactive materials from this drum storage area. The use of this replacement solution will be incorporated into the revised closure plans.

Comment 2: After cleaning the epoxy coated floors in Unit 211 and 212, the condition of the floors should be reported. The presence of contamination and floor cracking may require soil sampling for possible contamination migration.

Response 2: The Rocky Flats Plant agrees to inspecting and noting the condition of the floor in Unit 211 and 212, especially with respect to the presence of contamination and floor cracking. The Rocky Flats Plant agrees that in instances soil sampling for possible contamination migration may be necessary. However, these issues will be addressed as part of a RCRA Facility Investigation/Corrective Action activity related to decontamination and decommissioning of the Rocky Flats Plant buildings. The closure plan will only address areas related to the unit within the building.

DRAFT

Site 204

Comment 1: All pieces of equipment which have come into contact with hazardous constituents of the cooling oils and solvents must be decontaminated. None of the equipment used to wash or feed the chips to the roaster is mentioned in the closure plan. The closure plan states, "The chips are first rinsed with hot water to remove excess oils and coolants and then fed into the entry chute of the chip roaster" page 10. Identify and list the equipment used in the rinsing process, and the equipment used to feed the chips into the roaster.

Response 1: The Rocky Flats Plant essentially agrees with the above comment. However, the Rocky Flats Plant also considers disposal of any of the above equipment as a mixed low-level radioactive and hazardous waste as an acceptable option allowed by the closure regulations. If repeated attempts at decontamination are unsuccessful, then disposal of the equipment as a mixed low-level radioactive and hazardous waste will be done as a closure action. Equipment used in the rinsing process, and equipment used to feed chips into the roaster will be identified and listed in the revised closure plan.

Comment 2: At what locations are the "Six samples for HSL VOC" on Table 1, page 19 of the closure plan going to be taken?

Response 2: The samples for VOC analysis will be taken from the roaster vessel (estimated at four), and the cyclone separator (estimated at two). These samples will consist of soot from the surfaces in these areas. The actual sampling locations will be determined based upon identification of the presence of soot and accessibility of the location. A discussion of the sampling and possible decontamination procedures is found in Section 3.2 of the existing closure plan.

Comment 3: The equipment used to hold, wash and/or feed the chips prior to being fed to the "chip inlet" (Figure 4, page 9) is not heated to thermal destruction temperatures and is in contact with the cooling oils and solvents. The preroasting equipment could have potentially contaminated surfaces. Are any of the six samples mentioned above being taken from "preroasting" equipment surfaces? If not, the sampling location list should be expanded to include preroasting equipment.

Response 3: The Rocky Flats Plant agrees with the above comment. The sampling location list will be expanded to include samples taken from the preroasting equipment. It is currently anticipated that approximately two samples will be taken of this equipment, but a definitive number will be presented in the revised closure plan.

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Comment 4: Has the HEPA filter in the roaster stack been replaced since the roaster has ceased operation?

Response 4: The HEPA filter in the roaster stack has not been replaced since the roaster ceased operation.

Comment 5: What is the source of the oxalate, citrate and ammonium ions in the "inhibited" acidic powder being used as a cleaning solution listed on page 27?

Response 5: The source of the oxalate ion is oxalic acid. The source of the citrate ion is citric acid. The ammonium ions will be provided by ammonium chloride. These compounds will be mixed in appropriate quantities to formulate the required quantity of decontamination fluid.

We trust that these responses are complete enough for your evaluation. If you have any questions, please contact Rich Schassburger of my staff at 966-4888.

DOE

FB:sf

cc:
T. C. Greengard, EG&G
R. J. Schassburger, DOE/RFO